

## SCHEDULE (f)

## DESIGNATION DEPOSITION

**Schedule (f)****Designation Of Deposition Testimony To Be Read Into Evidence****Plaintiff's Designation**

<b>Description</b>	<b>Defendant's Basis for Objection</b>	<b>Plaintiff's Response to Objection</b>
Plaintiff may use portions of the depositions of the following individuals for impeachment purposes: <ul style="list-style-type: none"> <li>• Dawn Dworsky;</li> <li>• Sonia Koplowicz; and</li> <li>• Maureen Summers.</li> </ul>	Defendant objects to fact that Plaintiff did not designate the specific portions of the deposition transcripts to be read into evidence.	Plaintiff is unable to identify what specific portions of the deposition testimony will be necessary, if any for impeachment purposes.

**Defendant's Designation**

<b>Description</b>	<b>Plaintiff's Basis for Objection</b>	<b>Defendant's Response to Objection</b>
Defendant may use portions of Plaintiff's deposition transcript for impeachment purposes and/or seek to admit portions of Plaintiff's deposition transcript as a party admission. It is Defendant's understanding that because Plaintiff is a party, Defendant need not designate specific portions of her transcript.	No objection.	N/a.